



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 17, 2014

Via E-Mail

Brian Woodland
Chief Executive and Chief Financial Officer
Magnolia Lane Income Fund
7 Grove Street
Topsfield, Massachusetts 01983

Re: Magnolia Lane Income Fund
Form 10-K for the Year Ended April 30, 2013
Filed August 13, 2013
Form 10-Q for the Quarter Ended July 31, 2013
Filed September 23, 2013
Form 10-Q for the Quarter Ended October 31, 2013
Filed December 23, 2013
File No. 000-54379

Dear Mr. Woodland:

We have completed our review of your filings. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Linda Cvrkel

Linda Cvrkel
Branch Chief